

ROTHSCHILD CONNECTED DEVICES  
INNOVATIONS, LLC

Plaintiff,

VS.

AMERICAN HONDA MOTOR CO.,  
INC. et al

Defendant.

ROTHSCHILD CONNECTED DEVICES  
INNOVATIONS, LLC

Plaintiff,

VS.

BMW OF NORTH AMERICA, LLC

Defendant.

Case No: 2:15-cv-01877-JRG-RSP

## LEAD CASE

Case No: 2:15-cv-01874-JRG-RSP

## CONSOLIDATED CASE

**MOTION TO DISMISS DEFENDANT BMW OF NORTH AMERICA, LLC. WITH  
PREJUDICE**

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff Rothschild Connected Devices Innovations, LLC (“Rothschild”) files this Motion to Dismiss Defendant BMW of North America, LLC With Prejudice.

Wherefore, Rothschild moves this Court to dismiss this action and all claims by and between parties, with prejudice, with each party to bear its own costs, attorney's fees and expenses and request that the Court enter the proposed order of dismissal submitted herewith.

Plaintiff has attempted to meet and confer regarding this motion, but has not received a response from Defendant's counsel.

Dated: April 20, 2016

Respectfully submitted,

/s/ Jay Johnson

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 20, 2016.

/s/ Jay Johnson

Jay Johnson